

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

FILED

APR 11 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

In the Matter of the Search of)

Priority Mail Express package EE409949685US,)
addressed to "Samuel Hollins 74 Hucklebery CT)
Ofallon M.O. 63368," with a return address of "Tony)
Hollins 1137 Brunswick Daly city C.A. 94015.")

Case No. 4:19 MJ 6145 PLC

APPLICATION FOR A SEARCH WARRANT

I, Nathalie Saputa, a federal law enforcement officer or an attorney for the government request
a search warrant and state under penalty of perjury that I have reason to believe that on the following property:Priority Mail Express package EE409949685US, addressed to "Samuel Hollins 74 Hucklebery CT Ofallon M.O.
63368," with a return address of "Tony Hollins 1137 Brunswick Daly city C.A. 94015."
located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States currency

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

Title 21, U.S.C., §§ 846, 841(a)(1);
Title 18, U.S.C. Sections 1956 and 1957Conspiracy to possess with intent to distribute controlled
substance(s) and money laundering

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

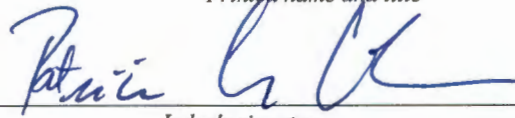
- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is
requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

NATHALIE SAPUTA, Postal Inspector
United States Postal Inspection Service

Printed name and title



Judge's signature

Honorable Patricia L. Cohen, U.S. Magistrate Judge

Printed name and title

AUSA: Jeannette S. Graviss

Sworn to before me and signed in my presence.

Date: 4/11/19City and State: St. Louis, MO

AFFIDAVIT

I, Nathalie Saputa, being duly sworn, state the following:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS). I have been employed by the USPIS for approximately one (1) year. I have been assigned to the Multi-Functional Team for approximately one (1) year. I have received advanced training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's Multi-Functional Team has intercepted numerous parcels, which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail – two-day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail is seldom used for individual-to-individual correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-

business correspondence. However, intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of and destinations for controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business or company listed is not associated with the mailer and was randomly selected by the mailer in an effort to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

5. Most business mailings sent via U.S. Postal Service (USPS) or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet), the USPIS learned that unknown persons posted intelligence on the Silk Road website warning prospective drug mailers that most USPIS search warrant affidavits for narcotics or narcotics proceeds packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and/or valid business names on narcotics or narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics or narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance

sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or addressed to a known narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information that is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed person-to-person; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and/or any other characteristic previously noted in this paragraph.

6. The U.S. Postal Inspection Service St. Louis Field Office's Multi-Functional Team has found the characteristics listed in paragraphs three, four, and five are indicative of packages that have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.

7. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient for the present purpose. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

8. On April 11, 2019, Inspector Jordan Wicks was reviewing inbound Priority Mail packages at the Network Distribution Center in Hazelwood, Missouri. While reviewing packages, he observed Priority Mail Express package **EE409949685US** (hereinafter "**Subject Package**"). The **Subject Package** was mailed on April 10, 2019, from Vallejo, California (Zip code: 94591). The **Subject Package** bore a handwritten mailing label, was addressed person-to-person, was heavily taped on all seams, wrapped in paper, and was confirmed to be originating from a known source narcotics area. These characteristics are consistent with characteristics of previous packages that have contained narcotics or proceeds of narcotics. Due to these characteristics, Inspector Wicks began a review of the mailing label on the Subject Package in order to verify the validity of the addressee and sender listed on the Priority Mail express label.

9. The **Subject Package** was addressed to “Samuel Hollins 74 Huckleberry CT Ofallon M.O. 63368,” with a return address of “Tony Hollins 1137 Brunswick Daly city C.A. 94015” A review of available USPS databases revealed that 74 Huckleberry Court, O’ Fallon, MO 63368 was a valid address. The return address was found to be invalid, however, Inspector Wicks did locate 1137 Brunswick Street, Daly City, CA, with the correct zip code of 94014. A law enforcement records check of 74 Huckleberry Court, O’ Fallon, MO 63368 found no one named “Samuel Hollins” associated with this address. A law enforcement records check of 1137 Brunswick Street, Daly City, CA 94014, the correct zip code, found no one with the name of “Tony Hollins” to be associated with this address. In the past, narcotics traffickers have utilized fictitious sender names and or addresses on mailings labels in an attempt to avoid law enforcement detection. Due to the characteristics associated with the **Subject Package**, such as fictitious sender and addressee names, incorrect sender zip code, originating from a known source narcotics area, heavily taped along all seams, a K-9 review was requested.


10. On April 11, 2019, Inspector Jordan Wicks contacted Detective Dave Sebek, a K-9 Detective employed by the St. Louis County Police Department. Detective Sebek responded to the USPIS St. Louis Field Office for a K-9 review. Detective Sebek was accompanied by his narcotic-trained canine, Pippi. The **Subject Package** was placed in an area not known to have been previously contaminated by a narcotic odor. Detective Sebek had Pippi search this area. Upon arriving at the **Subject Package**, Detective Sebek advised that Pippi reacted in a positive manner, indicating the presence of a narcotic odor.

11. The **Subject Package** is a large brown cardboard box and measures approximately eighteen inches, by eighteen inches, by twenty-five inches, and weighs approximately twenty-four pounds and fifteen ounces. Inspector Wicks later confirmed the mailer paid \$163.25 in cash to mail the package, a payment method that is consistently seen with packages that contain narcotics or narcotic proceeds. Based on my training and experience, as well as the training and experience of other members of the USPIS Saint Louis Narcotics Team, I know that the size and weight of the **Subject Package**, coupled with other indicators such as fictitious sender and addressee names, originating from a known source narcotics area, cash payment, heavily taped along all seams, incorrect sender zip code, and a positive reaction by a narcotic-trained canine, are consistent with other packages that have been found in the past to contain narcotic substances, or monies which

are the proceeds/payments of narcotics trafficking. It is my belief that the package will contain narcotics, a violation of Title 21, United States Code, Sections 841(a)(1) and 846.

12. The **Subject Package** is currently in the custody of U.S. Postal Inspector Nathalie Saputa in the Eastern District of Missouri. Attached herewith is a picture of the mailing label for Priority Mail Express package **EE409949685US** and a copy of the qualifications for Detective Sebek's canine, Pippi.

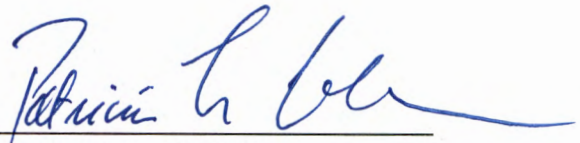
13. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.



NATHALIE SAPUTA

U.S. Postal Inspector

SUBSCRIBED and SWORN to before me this 1st day of April, 2019.



PATRICIA L. COHEN

United States Magistrate Judge

Eastern District of Missouri

St. Louis County Police Department
Division of Criminal Investigations Canine Detective
Canine Probable Cause Affidavit of Qualifications
Handler: Detective David Sebek, DSN 3341
Canine "Pippi" DSN 46

I, Detective David Sebek, DSN 3341, have been a Commissioned Police Officer of the St. Louis County Police Department since January 5, 2001. I have completed 200 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Pippi" and I are currently assigned to the St. Louis County Police Department's Division of Criminal Investigation's Drug Enforcement Unit.

Canine Pippi is a black and white colored, female, German Shorthair Pointer. She was born on February 8, 2013. Canine Pippi and I attended and completed the "Basic Police Canine Training Course for Narcotics Detection", from October 3, 2015, through October 30, 2015. This course was held at Shallow Creek Kennels, located in Sharpsville, PA. The training course consisted of four weeks of instruction and application of canine obedience, narcotics/controlled substance detection. Canine Pippi and I were certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on October 30, 2015.

Canine Pippi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, and Marijuana. Canine Pippi alerts to these odors in a passive manner by sitting at, or as close as she can get, to the source of the odor.

Canine Pippi and I were last annually re-certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on April 27, 2018.

Since Canine Pippi and I began working, she had been responsible for the seizure of approximately 994 lbs of marijuana, approximately 4.75 lbs of heroin, 118 lbs of methamphetamine, and 30 lbs of cocaine. Canine Pippi has also been responsible for the seizure of approximately \$2,291,679 in smuggled bulk US currency.

Canine Pippi and I train a minimum of four hours per week, in the areas of narcotic detection with the St. Louis County Police Department's Canine Unit and on our own time.

This affidavit is current as of January 1, 2019.

Detective David Sebek, DSN 3341
St. Louis County Police Department
Division of Criminal Investigations, Drug Enforcement Unit
7900 Forsyth Blvd
Clayton, MO 63105
(636) 529-8225

UNITED STATES
POSTAL SERVICE.

Retail

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US POSTAGE PAID

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Origin: 91802
03/12/19
0501080702-21

PRIORITY MAIL 2-Day®

DIM WT: 15 Lb
14" x 14" x 14"
ACTUAL WT:
10 Lb 14.0 Oz

1023

EXPECTED DELIVERY DAY: 03/14/19

C076

SHIP
TO:

726 N 84TH ST
EAST SAINT LOUIS IL 62203-1904

USPS TRACKING NUMBER



9505 5131 8283 9071 2654 28

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333 S. 6th St.
ALHAMBRA, CA
91801

TO:
DARIUS BROWN
726 N. 84th St.
E. SAINT LOUIS, IL
62203

Small

14" x 14" x 14"

Small / Pequeño